

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:	John and Deanna)	Case No. 15-13717
	Williams)	
)	
	Debtors.)	Chapter 13

MOTION TO CONVERT CASE TO ONE UNDER CHAPTER 11

COMES NOW the debtors, John and Deanna Williams, by and through their counsel, and, pursuant to 11 U.S.C. §1307(d) and Rule 1017(f) Fed.R.Bankr.P., move this court for an order converting this Chapter 13 case to a case under Chapter 11 of the Bankruptcy Code. In support of their motion, the Debtors would show the Court the following:

1. On September 29, 2015, this case was originally commenced by the filing of a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. Debtors' proposed Chapter 13 plan has not been confirmed.
3. This Chapter 13 case has not been previously converted.
4. Title 11 U.S.C. §1307(d) authorizes the Court to convert a Chapter 13 case to one under Chapter 11, provided that a proposed chapter 13 plan has not been confirmed. *See, 11 U.S.C. § 1307(d).*
5. Debtors qualify as "small business debtors" as defined by 11 U.S.C. §101 (51D).
6. Debtors respectfully request that their Chapter 13 case be converted to a case under Chapter 11.

Wherefore Debtors pray that this court enter its order converting this Chapter 13 case to one as a Small Business Chapter 11 case.

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant requested relief, or wish to have your views considered, you must file a written response or objection to the requested relief with the Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 14 days from the date of the filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Gabriel Rivera', is written over a horizontal line.

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CERTIFICATE OF SERVICE

This is to certify that on the 30th day of November 2015 a true and correct copy of the foregoing motion was mailed first class, postage pre-paid to all parties listed on the attached Exhibit "A" and to the following party:

John Hardeman
Chapter 13 Trustee
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Gabriel Rivera

EXHIBIT "A"
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EXHIBIT "A"
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